



UPS# 1ZY75R900199513410

January 30, 2019

**RECEIVED**

**FEB 1 - 2019**

Office of Enforcement, Compliance  
and Environmental Justice

USEPA Region VIII Director  
Air & Toxics Technical Enforcement Program  
Office of Enforcement, Compliance and Environmental Justice, Mail Code 8ENF-AT  
1595 Wynkoop Street, Denver CO 80202-1129

RE: Semi-annual Reports (NSPS Subparts KKK, OOOO, & OOOOa)  
Gilcrest Gas Plant (Permit#07WE0881)

Dear Sir or Madam:

Attached are Semi-annual Reports (SAR) covering the Leak Detection and Repair program (LDAR) for the Gilcrest Gas Plant, located in Weld County, Colorado. The reports cover the period from July 1, 2018 through December 31, 2018, and include LDAR programs for the following regulations:

- NSPS Subpart KKK
- NSPS Subpart OOOO
- NSPS Subpart OOOOa

The facility LDAR program during this semi-annual reporting period, particular the months of October, November, and December experienced changes within the Subparts KKK and OOOO process units. Due to implementation of Regulation 7 requirements to begin on January 1, 2019, all components that were historically subject to Subpart KKK were transitioned to comply with Subpart OOOO requirements. Additionally, Aka Energy took this transitional opportunity to reevaluate its historical process unit/component and database systems, as well as conduct an internal audit of the LDAR system. As a result, process units and components were identified, tagged, and added as appropriate to comply with both the federal and state LDAR programs. For this reporting period, process units for Subparts KKK and OOOO is reported as prior; however, the first semi-annual report in 2019, will see all process units (historically Subpart KKK and OOOO) wholly under the Subpart OOOO program.

Also, new components per four new process units were added to the facility during this reporting period; with tagging, documenting, recordkeeping, and monitoring for Subpart OOOOa purposes being completed in July.



To meet the requirements of 40CFR§60.4(a), 40CFR§60.487 and Colorado Regulation Number 6, these reports have been submitted in duplicate to USEPA Region VIII.

Please let us know if you need further information or have additional questions. I may be reached by email at (b) (6).

Sincerely,

(b) (6)

Air Quality Compliance Manager

Attachments as Described

cc: Rudy Quiroz (via email)

Colorado Department of Public Health & Environment, APCD-SS-B1, 4300 Cherry Creek Drive South, Denver, CO 80246  
(UPS Tracking# 1ZY75R900195211191)

**Compliance Repair Delay Report****Report Date: 7/1/2018 to 12/31/2018****Print Date: 1/29/2019 3:51:54PM****Plant: AKA ENERGY - GILCREST****Regulation: EPA600000a****Compliance Group: PROCESS**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
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**Number of Components Delayed for Compliance Group PROCESS - 0**

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

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**Added / Deleted Summary by Regulation (R602r)**

Report Date: 1/29/2019

**Report Parameters**

Reg: EPA600000a

Compliance Grp: PROCESS

Class: All Component Classes

Date: 7/1/2018 - 12/31/2018



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Compliance Group	Class Description	Added	Deleted
PROCESS	CONNECTOR	292	3
PROCESS	POTENTIAL OPEN END	74	1
PROCESS	PRESSURE RELIEF DEVICE	4	0
PROCESS	VALVE	193	0

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# STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA600000a

Company: **AKA ENERGY - GILCREST**

Compliance Group: **PROCESS**

Reporting Period: **7/1/2018 Through 12/31/2018**

1/22/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		July	August	September	October	November	December
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	1	0	3	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	2	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	1	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

## Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
July		
August		
September		
October		
November	4	(Shutdown on 11/27/18 - 11/30/18)
December		



## 60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 6/30/2018	Current Period Ending: 12/31/2018
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)		193
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)		0
Connectors 60.5422(a) & 60.487a (b)(5)		289
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)		0



**Compliance Repair Delay Report**

Report Date: 7/1/2018 to 12/31/2018

Print Date: 1/29/2019 3:51:54PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA600000a

**Compliance Group: REFRIGERATION**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
000872.02 1211	POE	26.0 26.0 HP Drains to Tie Point 14.0 Line 583	12/29/2018					
000643.02 1226	POE	16.0 16.0 Propane from Econo to Gas Chill - Line 370	12/29/2018					
000700.01 1221	POE	12.0 12.0 Propane Vap Gas Chill to Refrg Comp - Line 300	12/29/2018					

**Number of Components Delayed for Compliance Group REFRIGERATION - 3**

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

## Added / Deleted Summary by Regulation (R602r)

Report Date: 1/29/2019

### Report Parameters

Reg: EPA60000Ca

Compliance Grp: REFRIGERATION

Class: All Component Classes



Date: 7/1/2018 - 12/31/2018

Compliance Group	Class Description	Added	Deleted
REFRIGERATION	COMPRESSOR	3	0
REFRIGERATION	CONNECTOR	831	6
REFRIGERATION	POTENTIAL OPEN END	135	0
REFRIGERATION	PRESSURE RELIEF DEVICE	8	0
REFRIGERATION	PUMP	3	0
REFRIGERATION	VALVE	233	1

# STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA600000a

Company: **AKA ENERGY - GILCREST**

Compliance Group: **REFRIGERATION**

Reporting Period: **7/1/2018 Through 12/31/2018**

1/22/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		July	August	September	October	November	December
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	3	4	2	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	5	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	1	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

## Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
July		
August		
September		
October		
November	4	(Shutdown on 11/27/18 - 11/30/18)
December		



## 60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 6/30/2018	Current Period Ending: 12/31/2018
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)		227
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)		3
Connectors 60.5422(a) & 60.487a (b)(5)		825
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)		0



**Compliance Repair Delay Report****Report Date: 7/1/2018 to 12/31/2018****Print Date: 1/29/2019 3:51:54PM**

Plant: AKA ENERGY - GILCREST

Regulation: EPA600000a

Compliance Group: GLYCOL

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
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Number of Components Delayed for Compliance Group GLYCOL - 0

(b) (6)

Signature of Owner or Operator Responsible for Delay or Repair Decision

## Added / Deleted Summary by Regulation (R602r)

Report Date: 1/29/2019

### Report Parameters

Reg: EPA600000a

Compliance Grp: GLYCOL

Class: All Component Classes



Date: 7/1/2018 - 12/31/2018

Compliance Group	Class Description	Added	Deleted
GLYCOL	CONNECTOR	841	47
GLYCOL	POTENTIAL OPEN END	46	2
GLYCOL	PRESSURE RELIEF DEVICE	5	0
GLYCOL	PUMP	4	1
GLYCOL	VALVE	151	3

# STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA600000a

Company: **AKA ENERGY - GILCREST**

Compliance Group: **GLYCOL**

Reporting Period: **7/1/2018 Through 12/31/2018**

1/22/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		July	August	September	October	November	December
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	6	1	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

## Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
July		
August		
September		
October		
November	4	(Shutdown on 11/27/18 - 11/30/2018)
December		



## 60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 6/30/2018	Current Period Ending: 12/31/2018
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)		136
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)		3
Connectors 60.5422(a) & 60.487a (b)(5)		794
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)		0

**Compliance Repair Delay Report****Report Date: 7/1/2018 to 12/31/2018****Print Date: 1/29/2019 3:51:54PM****Plant: AKA ENERGY - GILCREST****Regulation: EPA600000a****Compliance Group: INLET**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
000133.00 1214	PUMP	11.0 11.0 NGL from Product Pump to Tie Point - Line 230	9/4/2018					
000174.00 1214	PUMP	11.0 11.0 NGL from Product Pump to Tie Point - Line 230	12/18/2018					
000080.00 1202	RELIEF	01.0 01.0 Inlet Gas - Line 100	9/4/2018	9/26/2018	WAITING ON PARTS - SPECIAL ORDER	PER PLANT	10/3/2018	10/4/2018

**Number of Components Delayed for Compliance Group INLET - 3**

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision



## Added / Deleted Summary by Regulation (R602r)

Report Date: 1/29/2019

### Report Parameters

Reg: EPA600000a

Compliance Grp: INLET

Class: All Component Classes



Date: 7/1/2018 - 12/31/2018

Compliance Group	Class Description	Added	Deleted
INLET	CONNECTOR	923	23
INLET	POTENTIAL OPEN END	119	5
INLET	PRESSURE RELIEF DEVICE	9	0
INLET	PUMP	4	0
INLET	VALVE	295	3

# STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA600000a

Company: **AKA ENERGY - GILCREST**

Compliance Group: **INLET**

Reporting Period: **7/1/2018 Through 12/31/2018**

1/22/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		July	August	September	October	November	December
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	1	2	4	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	1	2	0	1
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	1	0	0	1
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	5	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	1	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	1	0	0	0

## Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
July		
August		
September		
October		
November	4	(Shutdown on 11/27/18 - 11/30/18)
December		



## 60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 6/30/2018	Current Period Ending: 12/31/2018
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)		288
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)		4
Connectors 60.5422(a) & 60.487a (b)(5)		900
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)		0

**Compliance Repair Delay Report**

Report Date: 10/1/2018 to 12/31/2018

Plant: AKA ENERGY - GILCREST

Regulation: EPA0000

Compliance Group: 0000

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
2580	VALVE	GV	10/30/2018	10/31/2018	DOR TO REPLACE BALL VALVE	PER PLANT	11/30/2018	
2509	BALL							

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

**Added/Deleted Summary**

AKA ENERGY - Gilcrest

**Report Parameters**

0000

Report Period: From 10/01/2018 To 12/31/2018

Unit	Class	Added	Deleted
0000	CONNECTOR	1207	0
0000	PUMP	1	0
0000	VALVE (excluding NDE's)	526	0



**STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS  
SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000**

Company: **AKA ENERGY - GILCREST**

Compliance Group: **0000**

Reporting Period:

**10/1/2018 Through 12/31/2018**

Semiannual Monitoring Results 40 CFR 60.487 Reporting Requirements		<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>
40 CFR 60.487 (c) (2)(i)	No. Valves Leaks Detected	0	0	0	1	0	1
40 CFR 60.487 (c) (2)(ii)	Not Repaired <= 15 Days	0	0	0	1	0	0
40 CFR 60.487 (c) (2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
40 CFR 60.487 (c) (2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
40 CFR 60.487 (c) (2)(v)	No. Connector Leaks Detected	0	0	0	1	4	0
40 CFR 60.487 (c) (2)(vi)	Not Repaired <= 15 Days	0	0	0	0	1	0
40 CFR 60.636 (c) (1)	No. Relief Device Leaks Detected	0	0	0	0	0	0
40 CFR 60.636 (c) (2)	Not Repaired <= 15 Days	0	0	0	0	0	0

**Dates & Details of Process Unit Shutdowns During Reporting Period**

40 CFR 60.487 (c) (2)(vii) & (c)(3)

<i>Month</i>	<i># of Days</i>	<i>Comments About Outage/Shutdown/Turnaround</i>
<i>Jul</i>	0	
<i>Aug</i>	0	
<i>Sep</i>	0	
<i>Oct</i>	0	
<i>Nov</i>	4	(Shutdown on 11/27/18 - 11/30/18)
<i>Dec</i>	0	



**40 CFR 60.487 (c) (4) - Reporting of Inventory Revisions**

Reportable Inventory Components	Previous Period Ending: 9/30/2018	Current Period Ending: 12/31/2018
Valves - (Excluding No Detectable Emission) 40 CFR 60.487 (b) (2)	122	648
Pumps - (Excluding Dual-Seal and Closed Vent) 40 CFR 60.487 (b) (3)	0	1
Connectors 40 CFR 60.487 (b) (4)	229	1,436
Pressure Relief Devices that Vent to Atmosphere 40 CFR 60.636 (b)	0	0

## Compliance Repair Delay Report

Report Date: 7/1/2018 to 9/30/2018

Print Date: 1/29/2019 3:31:34PM

Plant: AKA ENERGY - GILCREST

Regulation: EPA60-0000

Compliance Group: 0000

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
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Number of Components Delayed for Compliance Group 0000 - 0

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

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**Added / Deleted Summary by Regulation (R602r)**

Report Date: 1/29/2019

**Report Parameters**

Reg: EPA60-0000

Compliance Grp: 0000

Class: All Component Classes



Date: 7/1/2018 - 9/30/2018

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Compliance Group	Class Description	Added	Deleted
0000	CONNECTOR	7	0
0000	POTENTIAL OPEN END	0	0
0000	VALVE	3	0

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**STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS  
SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPA60-0000**

Company: **AKA ENERGY - GILCREST**

Compliance Group: **0000**

Reporting Period: **7/1/2018 Through 9/30/2018**

1/29/2019

Semiannual Monitoring Results 40 CFR 60.5422 40 CFR 60.487 Reporting Requirements		July	August	September	October	November	December
60.5422(a) & 60.487a (c)(2)(i)	No. Valves Leaks Detected	0	0	1	0	0	0
60.5422(a) & 60.487a (c)(2)(ii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iii)	No. Pump Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(iv)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(vii)	No. Connector Leaks Detected	0	0	0	0	0	0
60.5422(a) & 60.487a (c)(2)(viii)	Not Repaired <= 15 Days	0	0	0	0	0	0
60.5422(c)(1) & 60.5401(b)(2)	No. Relief Device Leaks Detected	0	0	0	0	0	0
60.5422(c)(2) & 60.5401 (b)(3)	Not Repaired <= 15 Days	0	0	0	0	0	0

**Dates & Details of Process Unit Shutdowns During Reporting Period**

40 CFR 60.5422(a) & 40 CFR 60.487a (c)(2) & (c)(4)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
July		
August		
September		
October		
November		
December		



**60.5422(a), 60.487 (b)(3) - (b)(5), and 60.5401(b) - Reporting of Inventory Revisions**

Reportable Inventory Components	Previous Period Ending: 3/31/2018	Current Period Ending: 9/30/2018
Valves - (Excluding No Detectable Emission) 60.5422(a) & 60.487a (b)(2)	119	122
Pumps - (Excluding Dual-Seal and Closed Vent) 60.5422(a) & 60.487a (b)(3)	0	0
Connectors 60.5422(a) & and 60.487a (b)(5)	222	229
Pressure Relief Devices that Vent to Atmosphere 60.5422(a) & 60.5401 (b)	0	0



**Compliance Repair Delay Report**

Report Date: 10/1/2018 to 12/31/2018

Plant: AKA ENERGY - GILCREST

Regulation: EPAKKK

Compliance Group: KKK

Tag and Drawing	Class	State	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
974	VALVE	LL	10/26/2018	10/30/2018	DOR - NEEDS NEW VALVE	PER PLANT	11/30/2019	
2506	BALL							
1624	VALVE	GV	10/31/2018	11/5/2018	DOR	PER PLANT	11/30/2019	
2525	GLOBE							
2057	VALVE	GV	10/27/2018	10/30/2018	DOR - NEEDS NEW PACKING	PER PLANT	11/30/2019	
2511	CONTROL							
2133	VALVE	LL	10/28/2018	10/30/2018	DOR - ORDER VALVE	PER PLANT	11/30/2019	
2511	CONTROL							
2166	VALVE	LL	10/28/2018	11/12/2018	DOR	PER PLANT	11/30/2019	
2512	BUTTERFLY							
2170	VALVE	GV	10/28/2018	10/30/2018	DOR	PER PLANT	11/30/2019	
2511	NEEDLE							
2186 01	POE	GV	11/7/2018	11/12/2018	DOR	PER PLANT	11/30/2019	
2511	PLUG							
2193 01	POE	LL	11/6/2018	11/7/2018	DOR - SHUTDOWN - RETAPE / DOPE	PER PLANT	11/30/2019	
2516	PLUG							
2253 01	POE	LL	11/2/2018	11/5/2018	DOR	PER PLANT	11/30/2019	
2510	PLUG							
2288	VALVE	GV	10/23/2018	11/26/2018	DOR	PER PLANT	11/30/2019	
2510	NEEDLE							
2418.01	POE	GV	11/4/2018	11/9/2018	SHUTDOWN REQUIRED	PER PLANT	11/30/2019	
2509	PLUG							

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision

**Added/Deleted Summary**

AKA ENERGY - Gilcrest

**Report Parameters**

KKK

Report Period: From 10/01/2018 To 12/31/2018

Unit	Class	Added	Deleted
KKK	COMPRESSOR	0	0
KKK	PRESSURE RELIEF DEVICE	0	0
KKK	PUMP	23	0
KKK	VALVE	2002	0
KKK	CONNECTOR	8106	0

**STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS  
SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPAKKK**

Company: **AKA ENERGY - GILCREST**

Compliance Group: **KKK**

Reporting Period:

**10/1/2018 Through 12/31/2018**

Semiannual Monitoring Results 40 CFR 60.487 Reporting Requirements		<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>
40 CFR 60.487 (c) (2)(i)	No. Valves Leaks Detected	0	0	0	23	0	6
40 CFR 60.487 (c) (2)(ii)	Not Repaired <= 15 Days	0	0	0	8	0	5
40 CFR 60.487 (c) (2)(iii)	No. Pump Leaks Detected	0	0	0	2	1	1
40 CFR 60.487 (c) (2)(iv)	Not Repaired <= 15 Days	0	0	0	1	0	1
40 CFR 60.487 (c) (2)(v)	No. Compressor Leaks Detected	0	0	0	0	0	0
40 CFR 60.487 (c) (2)(vi)	Not Repaired <= 15 Days	0	0	0	0	0	0
40 CFR 60.636 (c) (1)	No. Relief Device Leaks Detected	0	0	0	3	2	0
40 CFR 60.636 (c) (2)	Not Repaired <= 15 Days	0	0	0	0	1	0

**Dates & Details of Process Unit Shutdowns During Reporting Period**

40 CFR 60.487 (c) (2)(vii) & (c)(3)

<i>Month</i>	<i># of Days</i>	<i>Comments About Outage/Shutdown/Turnaround</i>
<i>Jul</i>	0	
<i>Aug</i>	0	
<i>Sep</i>	0	
<i>Oct</i>	0	
<i>Nov</i>	4	(Shutdown on 11/27/18 – 11/30/18)
<i>Dec</i>	0	



**40 CFR 60.487 (c) (4) - Reporting of Inventory Revisions**

Reportable Inventory Components	Previous Period Ending: 9/30/2018	Current Period Ending: 12/31/2018
Valves - (Excluding No Detectable Emission) 40 CFR 60.487 (b) (2)	1,497	3,499
Pumps - (Excluding Dual-Seal and Closed Vent) 40 CFR 60.487 (b) (3)	15	38
Compressors - 40 CFR 60.487 (b) (4)	7	7
Pressure Relief Devices that Vent to Atmosphere 40 CFR 60.636 (b)	0	0

**Compliance Repair Delay Report****Report Date: 7/1/2018 to 9/30/2018****Print Date: 1/29/2019 3:09:32PM****Plant: AKA ENERGY - GILCREST****Regulation: EPAKKK****Compliance Group: KKK**

Tag and Drawing	Class	Stream ID Stream	Inspection Date	Placed on Delay	Reason for Delay	Documentation	Expected Repair	Removed From Delay
P-74A P74	PUMP	22 Y GRADE	9/8/2018					
HV08-73 HV08	VALVE	21 WET GAS	9/5/2018	9/20/2018	PROCESS UNIT SHUTDOWN REQUIRED TO REPAIR	PER ALAN BARTELS	12/1/2018	10/4/2018
HV13-31 HV13	VALVE	04 CONDENSATE	9/6/2018	9/20/2018	PROCESS UNIT SHUTDOWN REQUIRED TO REPAIR	PER ALAN BARTELS	12/1/2018	10/4/2018

**Number of Components Delayed for Compliance Group KKK - 3**

(b) (6)

Signature of Owner or Operator Responsible for Delay of Repair Decision



## Added / Deleted Summary by Regulation (R602r)

Report Date: 1/29/2019

### Report Parameters

Reg: EPAKKK

Compliance Grp: KKK

Class: All Component Classes



Date: 7/1/2018 - 9/30/2018

Compliance Group	Class Description	Added	Deleted
KKK	COMPRESSOR	0	0
KKK	CONNECTOR	0	22
KKK	POTENTIAL OPEN END	0	1
KKK	PRESSURE RELIEF DEVICE	0	0
KKK	PUMP	0	0
KKK	VALVE	3	9

# STANDARDS OF PERFORMANCE FOR VOC EQUIPMENT LEAKS SEMI-ANNUAL REPORT (40 CFR 60) Subpart: EPAKKK

Company: **AKA ENERGY - GILCREST**

Compliance Group: **KKK**

Reporting Period: **7/1/2018 Through 9/30/2018**

1/29/2019

Semiannual Monitoring Results 40 CFR 60.487 Reporting Requirements		July	August	September	October	November	December
40 CFR 60.487 (c) (2)(i)	No. Valves Leaks Detected	0	0	6	0	0	0
40 CFR 60.487 (c) (2)(ii)	Not Repaired <= 15 Days	0	0	2	0	0	0
40 CFR 60.487 (c) (2)(iii)	No. Pump Leaks Detected	0	0	1	0	0	0
40 CFR 60.487 (c) (2)(iv)	Not Repaired <= 15 Days	0	0	1	0	0	0
40 CFR 60.487 (c) (2)(v)	No. Compressor Leaks Detected	0	0	0	0	0	0
40 CFR 60.487 (c) (2)(vi)	Not Repaired <= 15 Days	0	0	0	0	0	0
40 CFR 60.636 (c) (1)	No. Relief Device Leaks Detected	0	0	0	0	0	0
40 CFR 60.636 (c) (2)	Not Repaired <= 15 Days	0	0	0	0	0	0

## Dates & Details of Process Unit Shutdowns During Reporting Period

40 CFR 60.487 (c) (2)(vii) & (c)(3)

Month	# of Days	Comments About Outage/Shutdown/Turnaround
July		
August		
September		
October		
November		
December		



## 40 CFR 60.487 (c) (4) - Reporting of Inventory Revisions

Reportable Inventory Components	Previous Period Ending: 3/31/2018	Current Period Ending: 9/30/2018
Valves - (Excluding No Detectable Emission) 40 CFR 60.487 (b) (2)	1,509	1,497
Pumps - (Excluding Dual-Seal and Closed Vent) 40 CFR 60.487 (b) (3)	15	15
Compressors - 40 CFR 60.487 (b) (4)	7	7
Pressure Relief Devices that Vent to Atmosphere 40 CFR 60.636 (b)	0	0